

1 A. No.

2 Q. Okay. So to the best of your knowledge,
3 they don't have any personal information about the
4 events?

5 A. No.

6 Q. When did you first decide to put a new
7 roof on the house, if you can recall?

8 A. June, 1995.

9 Q. What is it about that that makes it clear
10 in your memory?

11 A. Well, when we bought the house, it needed
12 a new roof.

13 Q. Okay. And when did you decide this is
14 time to do it?

15 A. I'm trying to think how to answer this.

16 It was just a matter of when we had enough money to
17 do it.

18 Q. Now, according to the lawsuit, the
19 accident happened on or about September the 7th,
20 2001. Is that consistent with your recollection?

21 A. Yes.

22 Q. Do you remember what day of the week that
23 was?

1 A. I have no idea.

2 Q. With September 7, 2001 as the day of the
3 accident, when is the first time -- strike that.

4 When did you -- how is it that Dade did the
5 roofing?

6 A. In June of 1995, we bought the house. We
7 knew it needed a new roof. We knew we were going to
8 add on. For several years we planned that, thought
9 about it, figured out what it would look like. And
10 there is a green roof exactly like the one I have on
11 a bed and breakfast in Connecticut. We used to drive
12 by it. Eventually, a couple years later, we stopped
13 by, talked to the owners, found out who did their
14 roof and then we called them probably two years
15 before we ever contacted our contractor because that
16 was the roof I wanted.

17 Q. Do you recall who it was at Dade that you
18 spoke with when you were first investigating the
19 roof?

20 A. No. I gave the name and number of that
21 firm to Tom Boland when we hired Boland to do our
22 construction. We said, "This is the roof we want."

23 Q. By the way, do you work outside the home?

1 A. Yes.

2 Q. And what is your professional occupation?
3 A. I'm a consultant for a management
4 consulting firm.

5 Q. And do you -- I ask do you work outside of
6 the home, do you have a home office or do you
7 work --

8 A. I have a home office. I live in
9 a virtual -- I work in a virtual office environment
10 and I travel probably four or five days a week,
11 three-quarters of the year.

12 Q. But the home base is 169?

13 A. Yes.

14 Q. How did you decide to have Boland do the
15 general construction that was being done at the
16 house?

17 A. I had a very good friend, who has since
18 passed away, but she had remodeled a couple of houses
19 and I had asked her for someone who was good and
20 reliable.

21 Q. About when was it that you started
22 investigating and coming up with Boland as --

23 A. About 18 months before we started.

1 Q. And generally what work was Boland to do?
2 I don't need the specifics, but generally what were
3 they to do?

4 A. He was our contractor, so he was
5 responsible for getting it done.

6 Q. Okay. But what renovations or remodeling
7 was being done?

8 A. We added an addition -- we actually did
9 two additions at the same time, one on the back of
10 the house and one on the side of the house. And he
11 reroofed our barn and our house at the same time. So
12 he was responsible for all of that. And we put in a
13 new septic system.

14 Q. Now, during that period of time, you were
15 generally on the road four days a week?

16 A. Yes.

17 Q. Do you recall when Boland began the work?

18 A. I don't recall the exact date or time.

19 Q. Do you recall roughly how long before the
20 accident Boland began the work?

21 A. Well, I don't recall the exact months or
22 dates. At the stage he was in, he had to have begun
23 a lot sooner to get to the roof part.

1 Q. And you have your area where you work and
 2 that's near an area where these gentlemen were
 3 looking at --

4 A. Yes.

5 Q. -- what work was to be done?

6 A. Yes.

7 Q. Where did you see them walking and
 8 inspecting and viewing inside the house?

9 A. **In the kitchen, where the -- the kitchen,**
 10 **which is the addition.**

11 Q. And do you recall anything that was said
 12 by anybody?

13 A. Not really.

14 Q. Who all was there, do you recall?

15 A. **Well, Boland was there.**

16 Q. And this is Tom Boland?

17 A. **Tom Boland. Someone from -- I think there**
 18 **were -- actually, two guys from the roofers. And**

19 **that's all I remember.**

20 Q. Okay.

21 A. **I think, you know, the plumber might have**
 22 **been -- you know, there were people there everywhere**

23 **all the time. And when you're trying to work, it's,**

1 anybody from Dade Roofing where there was some
 2 discussion going on that you could either see or
 3 overhear that you can recall today?

4 A. **Other than the day of the accident, no.**

5 Q. Now, turning back to the other occasion
 6 when Boland was showing the roofers sort of around,
 7 do you recall -- and I may have asked you this, and I
 8 apologize -- do you recall specifically anything that
 9 was said to anybody?

10 A. **I don't recall anything specific. I know**
 11 **that there was -- it was before they actually started**
 12 **the barn. And so there was a discussion about what**
 13 **was going to happen first. I was very interested in**
 14 **the order of events. I -- not being home a lot,**
 15 **that's an important issue to me. I want to know**
 16 **what's going to get done, who is going to do it, what**
 17 **time are they going to -- and I know the plan was**
 18 **made to do the barn first and the kitchen last.**

19 **I know that -- and I honestly don't**
 20 **know -- and I guess that's all I know. I just know**
 21 **it was -- the order of events was very important and**
 22 **the landscape of what they had to do, what they had**
 23 **to accomplish. And the fact that we talked about how**

18

20

1 **you know... Do you know what I'm saying? I wouldn't**
 2 **know who was there, who was not. I just**
 3 **remember -- I remember Tom was walking the roofers**
 4 **through. And, you know, it was a pretty exciting**
 5 **step, as I said earlier, so we were all interested**
 6 **in -- this was -- just the fact that the roof was**
 7 **going to finally get on.**

8 Q. Was your husband home at that time?

9 A. Yes.

10 Q. And was he in the kitchen area as well?

11 A. Yes.

12 Q. Do you recall who was there with Dade, the
 13 organization?

14 A. **(Witness shook head.)**

15 Q. The roofers?

16 A. No.

17 Q. Do you know -- do you remember whether or
 18 not Robert Dade was there?

19 A. No.

20 Q. Do you know who Michael Dade is?

21 A. No.

22 Q. Did you have any -- were there any other

23 occasions in which you were in the vicinity of

1 **we wanted the flow of the roof to go because the roof**
 2 **was going over both the old and the new. It was very**
 3 **important to me to see it tied together, that it**
 4 **looked like it was a single job, not two pieces.**

5 **I know they talked about the skylights.**

6 **They talked about the overhang on the porch. And we**
 7 **had a problem with how the overhang was fitting**
 8 **together. I know they talked about that. But I**
 9 **think that's all.**

10 Q. There were skylights to be installed in
 11 the kitchen, correct?

12 A. Yes, three.

13 Q. Had those skylights been installed?

14 A. **Skylights were not installed.**

15 Q. Had the openings been cut?

16 A. Yes.

17 Q. And what was covering the openings, if you
 18 know?

19 A. **Eventually there was tarpaper covering the**
 20 **openings, but I don't remember if that tarpaper was**
 21 **on that day or if it was put on later. Tom was in**
 22 **the -- Tom was -- Tom was in the process of getting**
 23 **the roof ready for the guy to put -- for the roofing**

1 Q. When you saw Robert Dade on the floor of
 2 the kitchen, did you recognize him at all as having
 3 been in the group of people who had done the
 4 walk-through --

5 A. Yes.

6 Q. -- earlier?

7 A. Yes.

8 Q. After the accident and after you got to
 9 Mr. Dade, what did you say to him, what did he say to
 10 you?

11 A. I don't remember specifically what he
 12 said. I know I tried to help him get up. He didn't
 13 want to be touched. Stew had rushed up as well. And
 14 I don't even remember which one of us called 911.
 15 One of us did. He just didn't want to be touched. I
 16 offered to help, but it appeared that he was in a lot
 17 of pain and was afraid to be touched. So we just
 18 tried to calm him down.

19 Q. How long did it take for EMTs, ambulance
 20 to arrive?

21 A. It seemed like moments. We live very
 22 close to town. So it wasn't very long at all.

23 Q. As best you can tell me -- and you may

1 that?

2 A. No.

3 Q. So you've never spoken to him since then,
 4 to your knowledge?

5 A. There were one or two phone calls
 6 exchanged between their company -- I don't remember
 7 if I personally did it or Stew called them. We were
 8 very concerned of how he was doing. So I don't
 9 remember if they called us or we called them.
 10 Something. But maybe within a few days of that
 11 making sure he was okay.

12 Q. And those discussions concerned his
 13 health?

14 A. Yes.

15 Q. And did they concern in any way -- was
 16 there any discussion at all about how the accident
 17 happened?

18 A. No.

19 Q. After the accident, did you talk to Tom
 20 Boland about how the accident happened?

21 A. Not about how the accident happened, but I
 22 called Tom and actually talked to his -- actually
 23 talked to his wife. And then she had Tom call me.

1 have already told me everything you can recall -- but
 2 tell me everything you can recall from the time --
 3 that was said either to Mr. Dade or by Mr. Dade from
 4 the time you got there, after hearing the scream and
 5 the crash, until he was taken away by the ambulance?

6 A. Well, Stewart and I were trying to help
 7 him and comfort him. It wasn't -- we weren't very
 8 good at it and he wasn't real receptive. And he was
 9 trying -- I remember he was trying to maintain
 10 composure.

11 When the EMT people got there, he didn't
 12 want -- he was afraid of being touched. And it
 13 was -- there was a lot of contention at the time
 14 between them and him. And sitting here now, I don't
 15 even remember what happened after that. I don't
 16 remember if they finally got him to go to the
 17 hospital or if he drove himself. Now I can't
 18 remember. I think they finally got him to cooperate.
 19 I think that he was just in a lot of pain.

20 But, you know, I honestly don't remember.
 21 It was a long time ago and it was a very intense day.

22 Q. Right. After Mr. Dade was taken in the
 23 ambulance to the hospital, did you ever see him after

1 Q. And when you spoke to Tom Boland, what did
 2 he say to you and what did you say to him?

3 A. He was just hornified that it happened.
 4 Q. And was there any discussion about how and
 5 what had transpired, what caused it, anything like
 6 that?

7 A. There was some discussion about how and
 8 what had transpired.

9 Q. Just tell me what you recall.

10 A. The things that I recall is that none of
 11 us knew that the roofers were going to be at the main
 12 house that day, there wasn't supposed to be any
 13 activity taking place up where we were. And they
 14 hadn't finished the barn yet. So that was the first
 15 thing, we were surprised that they were even up at
 16 the house.

17 Tom was just frustrated, seemed frustrated
 18 to me, and Stew seemed frustrated because they had
 19 just walked the guys through the day before, a couple
 20 days before, showing them the skylights so they would
 21 know the job and couldn't believe that it happened
 22 It was mostly disbelief that it happened, is the
 23 sense that I got.